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October 23, 2015

Hon. Joel Schneider  
United States District Court  
Mitchel H. Cohen Building  
& U.S. Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, New Jersey 08101

Re: *In re Concussion Reduction Litigation*; 1:13-CV-7585 (JBS) (JS)

Dear Judge Schneider,

This letter is to serve as the joint submission from both parties regarding discovery and ESI disputes, as Ordered by Doc. 73, #7. On Wednesday, October 21, 2015, counsel for both parties<sup>1</sup> met in person at the offices of Kelley Drye in Parsippany, New Jersey to discuss the scope of discovery and ESI for this matter. After discussing the parties' positions with regard to the proposed course of discovery, both sides agreed to file simultaneous letter briefs setting forth their respective positions. These letters will also address disputes regarding Third Party Subpoenas.

Plaintiffs and Defendants agreed upon a proposed Discovery Confidentiality Order, which shall be filed by Defendants today, October 23, 2015. After the meet and confer, Plaintiffs provided a proposed ESI Agreement. The Parties will continue to work in good faith to resolve disputes regarding ESI, and come to an agreement upon an appropriate protocol for production of electronically stored information.

In lieu of providing a summary of their respective positions in this letter, both parties will file their respective letter briefs today, October 23, 2015, to be argued at the hearing on November 5, 2015.

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<sup>1</sup> The following is a list of attendees for the Plaintiffs: Stephen Corr, Dennis Pantazis, D.G. Pantazis, Jr., Clay Lowe, Donald Ecklund (Plaintiffs' ESI consultants were available by phone). The following is a list of attendees for the Defendants: Michael Lynch, Joseph Boyle, James Saylor, and Defendants' ESI consultant.



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Respectfully submitted,

/s/ Stephen A. Corr

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*On Behalf of All Plaintiffs*

/s/ Joseph A. Boyle

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*On Behalf of All Defendants*